

LAW OFFICE OF  
**JOSHUA J. LAX**  
225 BROADWAY, STE 715, NEW YORK, NEW YORK 10007

June 25, 2025

**BY ECF**

Honorable Taryn A. Merkl  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Shamoli Kapoor v. Michael Matthew Jewelers of Kings Plaza, LLC, et.al.*,  
Docket No. 22 CV 5027 (HG)(TAM)**

Your Honor:

I represent Plaintiff Shamoli Kapoor in the above-referenced matter. I write jointly with counsel for the Butt Defendants, Jesse D. Eisenberg, Esq., to respectfully renew Plaintiff's request for a discovery conference and the parties' request for an extension of discovery. The parties previously submitted joint letters on both April 25, 2025, and May 28, 2025 (Docket Entries 99 and 100) for these applications. The bases for these applications are stated in these submissions. In addition, the parties respectfully request an extension of the date by which they must certify the completion of discovery from June 27, 2025, to a date after the requested discovery conference. The bases for this request is to allow additional time for the parties to receive the Court's guidance and orders on the outstanding discovery issues raised in the April 25, 2025, letter.

The parties thank the court for its consideration of this application.

Respectfully submitted,

/s/

Joshua J. Lax, Esq.

CC: All Counsel (By ECF)